

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

MOTOROLA, INC.,)	
)	
Plaintiff,)	
)	
v.)	
)	
LEMKO CORPORATION, XIAOHONG)	
SHENG, SHAOWEI PAN, HANJUAN JIN,)	
XIAOHUA WU, XUEFENG BAI,)	
NICHOLAS LABUN, BOHDAN PYSKIR,)	
HECHUN CAI, JINZHONG ZHANG,)	
ANGEL FAVILA, ANKUR SAXENA,)	Case No. 08 CV 5427
RAYMOND HOWELL, FAYE VORICK,)	
and NICHOLAS DESAI,)	
)	
)	
)	
Defendants.)	Judge Matthew F. Kennelly
)	
* * * * *)	Magistrate Judge Geraldine Soat Brown
LEMKO CORPORATION, SHAOWEI PAN,)	
XIAOHUA WU and XIAOHONG SHENG,)	
)	
Counter-Plaintiffs,)	
)	
v.)	
MOTOROLA, INC.,)	
)	
Counter-Defendant.)	

**PLAINTIFF MOTOROLA, INC.’S
MOTION FOR AN EXTENSION OF DEADLINES**

Plaintiff Motorola, Inc. (n/k/a Motorola Solutions, Inc., and hereafter referred to as “Motorola”), by and through its attorneys, hereby respectfully requests an extension of deadlines.

An additional modest amount of time—approximately 30 days—is necessary so that Motorola can complete discovery and prepare its case for trial. Much of the discovery remains outstanding due to Defendant Lemko Corporation’s (“Lemko”) lack of cooperation and due to

events outside of Motorola's control, including Lemko's recent change of counsel which effectively resulted in a one month stay of fact discovery between June and July 2011. Motorola therefore respectfully requests that each of the remaining deadlines be extended by roughly 30 days as follows:

Current Deadlines	Proposed Deadlines
Fact Discovery Deadline (November 18, 2011)	Fact Discovery Deadline (December 16, 2011)
26(a)(2) disclosure deadline for the party with burden of proof (January 13, 2012)	26(a)(2) disclosure deadline for the party with burden of proof (February 10, 2012)
Rebuttal disclosure deadline (February 24, 2012)	Rebuttal disclosure deadline (March 23, 2012)
Expert Discovery Deadline (March 23, 2012)	Expert Discovery Deadline (April 20, 2012)
Deadline for filing dispositive motions (April 23, 2012)	Deadline for filing dispositive motions (May 21, 2012)
Response to disposition motions (May 21, 2012)	Response to disposition motions (June 18, 2012)
Replies in support of dispositive motions (June 4, 2012)	Replies in support of dispositive motions (July 2, 2012)

Motorola does not seek to change the July 30, 2011 trial date, but understands that date may need to be modified if the Court grants Motorola's current motion.

Wherefore, Motorola respectfully requests that this Honorable Court grant its Motion for an Extension of Deadlines.

Date: July 25, 2011

Respectfully submitted,

By: /s/ Maureen L. Rurka

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Attorneys for Plaintiff Motorola, Inc.

CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing was filed electronically in compliance with the General Order on Electronic Case Filing, Section III(B)(1). As such, these documents were served on all counsel who are deemed to have consented to electronic service. Fed. R. Civ. P. 5(b)(2)(D) and Local Rule 5.9.

Date: July 25, 2011

/s/ Maureen L. Rurka

Attorney for Plaintiff Motorola, Inc.